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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF CARL SPILLY IN  
SUPPORT OF GOOGLE LLC'S MOTION  
IN *LIMINE* NO. 3 TO EXCLUDE  
EVIDENCE AND ARGUMENT  
REGARDING PRODUCTS, SERVICES,  
REGULATIONS, AND DATA FLOWS  
OUTSIDE OF THE SCOPE OF  
PLAINTIFFS' ALLEGATIONS**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

1 I, Carl Spilly, declare as follows:

2 1. I am a member of the bar of the District of Columbia and an associate with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendants Google LLC (“Google”) in this  
4 action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn  
5 as a witness, I could and would testify competently thereto.

6 2. Attached hereto as Exhibit A is a list of Plaintiffs’ proposed exhibits that Google  
7 seeks to exclude for the reasons discussed in its motion.

8 3. Attached hereto as Exhibit B is a list of Plaintiffs’ proposed exhibits that Google  
9 seeks to exclude for the reasons discussed in its motion.

10 4. Attached hereto as Exhibit C is a list of Plaintiffs’ proposed exhibits that Google  
11 seeks to exclude for the reasons discussed in its motion.

12 5. Attached hereto as Exhibit D is an excerpt of the transcript of the February 18, 2022  
13 Deposition of Rory McClelland.

14  
15 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
16 and correct.

17 Executed in Washington, DC, on October 17, 2023.

18  
19 By /s/Carl Spilly  
Carl Spilly